

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: **Case No.: 18-14603**
Brian J. Felt : **Chapter 13**
Debtor(s) : **Judge Magdeline D. Coleman**
: *********

**OBJECTION OF REAL TIME RESOLUTIONS, INC. AS AGENT FOR RRA CP
OPPORTUNITY TRUST 2 TO CONFIRMATION OF THE PLAN
(DOCKET NUMBER 8)**

Real Time Resolutions, Inc. as agent for RRA CP Opportunity Trust 2 ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Brian J. Felt ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 47 N. Traymore Avenue, Warminster, PA 18974 ("Property").
2. Creditor has filed Proof of Claim number 5 in the amount of \$172,453.88. This amount includes a pre-petition arrearage in the amount of \$66,207.02.
3. Debtor's Plan appears to cramdown Creditor's lien to a secured value of \$0.00 at an interest rate of 0%.
4. Pursuant to 11 U.S.C. §506, Creditor is entitled to a secured claim based on the replacement value of the property on the date the bankruptcy was filed. Creditor requests an opportunity to conduct a full interior and exterior appraisal.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Adam B. Hall
Karina Velter, Esquire (94781)

Adam B. Hall (323867)
Sarah E. Barngrover (323972)
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Attorneys for Creditor
The case attorney for this file is Karina
Velter.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of Real Time Resolutions, Inc. as agent for RRA CP Opportunity Trust 2 to the Confirmation of the Original Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Jon M. Adelstein, Attorney for Brian J. Felt, 350 South Main Street, Suite 105, Doylestown,
PA 18901, jadelstein@adelsteinkaliner.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on January 2,
2019:

Brian J. Felt, 47 N. Traymore Ave., Warminster, PA 18974

Wilmington Savings Fund Society, C/O Phelan, Hallinan, Diamond & Jones, One Penn
Center Plaza, 1617 JFK Boulevard, Suite 1400, Philadelphia, PA 19103

DATE: 01/02/2019

/s/ Adam B. Hall
Karina Velter, Esquire (94781)
Adam B. Hall (323867)
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